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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,
20 Plaintiff,
21 v.
22 UBER TECHNOLOGIES, INC.,
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ESTHER KIM
CHANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Trial Date: October 2, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based upon matters
4 within my own personal knowledge and if called as a witness, I could and would competently
5 testify to the matters set forth herein. I make this declaration in support of Defendants'
6 Administrative Motion to File Under Seal Portions of Defendants' April 24, 2017 Letter Brief to
7 Magistrate Judge Corley ("Defendants' Letter Brief") and certain Exhibits thereto.

8 2. The redacted portions of Defendants' Letter Brief, the redacted portions of
9 Exhibits A and C to Defendants' Letter Brief, and the entirety of Exhibit B to Defendants' Letter
10 Brief contain information that Plaintiff Waymo LLC has designated as "Confidential" or "Highly
11 Confidential – Attorneys' Eyes Only" in accordance with the Patent Local Rule 2-2 Interim
12 Model Protective Order ("Protective Order"), which the parties have agreed govern this case
13 (Transcript of 3/16/2017 Hearing, page 6).

14 3. Defendants are required to file this material under seal in accordance with
15 Paragraph 14.4 of the Protective Order.

16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct. Executed this 26th day of April, 2017, in San Francisco, California.

18
19 /s/ Esther Kim Chang
Esther Kim Chang

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21
22 **ATTESTATION OF E-FILED SIGNATURE**

23 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
24 Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang
25 has concurred in this filing.

26 Dated: April 26, 2017

27 /s/ Arturo J. González
Arturo J. González